

REMARKS

Claims 1-13 are all of the claims presently pending in this application after entry of the foregoing amendments. Claims 9-12 are newly added dependent claims of claim 8 that correspond, respectively, to claims 3-6. New claim 13 depends from claim 1 and recites pretreatment electrodes, such as described and shown in the present application.

Claims 1-6 and 8 are rejected under 35 U.S.C. §102(b) as being anticipated by Goffetre. Claim 7 is rejected under 35 U.S.C. §103(a) as being unpatentable over Goffetre in view of Kelley.

With respect to claims 1 and 2 (and apparently also claim 8), the Examiner takes the position that all of the claimed features are disclosed by Goffetre. However, the cathodes 40a and 40b in Goffetre are clearly not “horizontally facing each other” like the cathodes 8 in the present application (see claims 1 and 8; and Fig. 1). Consequently, since not every claimed feature is taught by Kelly, the anticipation rejection must fail.

As to claims 3 and 4, the Examiner argues that the material or article worked upon (here, the continuous sheet 3) is not part of the “apparatus” and, therefore, cannot make the claims patentable. Claims 3 and 4 are hereby amended to recite a “system” and, therefore, the features in these claims should be given patentable weight.

As to claims 5 and 6, the Examiner argues that expressions relating the apparatus to its contents during operation cannot make the claims patentable. However, the target material is at least initially part of the cathode that, in turn, is part of the apparatus and, therefore, claim 5 should be given patentable weight. Likewise, Applicants respectfully submit that the gas used for film deposition can be considered as part of the apparatus, at least initially.

Finally, with respect to claim 7, the Examiner admits that Goffetre fails to teach or suggest an apparatus capable of applying a specific tension range to the substrate to be processed. To supply this deficiency, the Examiner relies on Kelley, which relates to a plasma surface treatment device (not film deposition by sputtering). However, the only examples of tensions in Kelley are 40 gm/meter and 100 gm/meter (see col. 5, lines 34 and 38). Based on conversion calculations, these tensions are believed to correspond to 0.39 N/m and 0.98 N/m. However, claim 7 recites a range of 1 N/m to 15 N/m. Clearly, then, Kelley is deficient.

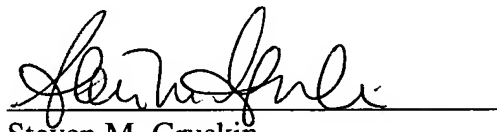
In view of the preceding amendments and remarks, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephonic interview, she is kindly requested to contact the undersigned attorney at the local telephone number listed below.

AMENDMENT UNDER 37 C.F.R. §1.111
U.S. SERIAL NO. 10/066,380

ART UNIT 1763
Q67634

The USPTO is directed and authorized to charge all required fees (except the Issue Fee and/or the Publication Fee) to our Deposit Account No. 19-4880. Please also credit any overpayment to said Deposit Account.

Respectfully submitted,



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Date: July 29, 2003